

EXHIBIT A

Civil Action File No. 5:23-mc-00001-LGW-BWC
*Plaintiff Coalition for Good Governance's Reply to Defendant's Response to
Motion for Sanctions*

**IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF GEORGIA**

COFFEE COUNTY BOARD)	
ELECTIONS &)	
REGISTRATION,)	
)	Civil Action No. 1:17-cv-02989-AT
Movant)	
)	
v.)	
)	
DONNA CURLING, DONNA)	
PRICE, AND JEFFREY)	
SCHOENBERG,)	
)	
Respondents)	

**COFFEE COUNTY BOARD OF ELECTIONS AND
REGISTRATION’S RESPONSE TO CURLING SUBPOENA FOR
PRODUCTION OF DOCUMENTS**

Coffee County Board of Elections & Registration (CCBOE) and provides the following response to the Subpoena for Production of Documents issued to the Coffee County Board of Elections and Registration by Counsel Halsey Knapp for his clients Donna Curling et al. originally dated June 30, 2022, now scheduled for August 1, 2022, as follows:

1. Documents that evidence, refer to, or reflect when any Unauthorized Access to Coffee County’s Election System, EMS Servers and Election Data took place.

Response: None.

2. Documents that evidence, refer to, or reflect the Persons involved in any way, or who have knowledge of, any Unauthorized Access to Coffee County's Election System, EMS Servers and Election Data, including, but not limited to, Persons who organized, planned, communicated about, led, participated in, were present during, or have knowledge of such events.

Response: None. In good faith, former Election Supervisor Misty Hampton's county issued cell phone contents will be produced so that Plaintiffs may review the contents therein to determine if there are any documents responsive unappreciated by CCBOE's staff and/or counsel.

3. Documents that evidence, refer to, or reflect what data, systems, and processes were accessed during any Unauthorized Access to Coffee County's Election System and EMS Servers.

Response: None.

4. Documents that evidence, refer to, or reflect how Unauthorized Persons were able to gain access to Coffee County's Election System and EMS servers during any Unauthorized Access to Coffee County's Election System, EMS Servers and Election Data.

Response: None.

5. Documents that evidence, refer to, or reflect which Coffee County Election System images, devices, or documents were scanned and/or imaged and/or copied by Unauthorized Persons as part of any Unauthorized Access to Coffee County's Election System, EMS Servers and Election Data.

Response: None.

6. All electronic files, including but not limited to election data, server images, or ballot images obtained during the Unauthorized Access to Coffee County's Election System, EMS Servers and Election Data by You or other Persons.

Response: None.

7. Documents that evidence, refer to, or reflect why the Coffee County EMS server was replaced during 2021 and/or any Communications regarding its replacement and the reason therefor.

Response: Coffee County Board of Elections and Registration has no additional documents to provide in response to this request outside of what has been previously provided to Marilyn Marks in response to prior Open Records Requests to Coffee County, which Plaintiffs have previously agreed need not be re-produced.

8. Documents that evidence, refer to, or reflect when, why, and by whom the Coffee County EMS server's password was changed by any Person after the 2020 presidential election and any problems Coffee County officials encountered with the EMS server password in 2021.

Response: Coffee County Board of Elections and Registration has no additional documents to provide in response to this request outside of what has been previously provided to Marilyn Marks in response to prior Open Records Requests to Coffee County, which Plaintiffs have previously agreed need not be re-produced.

9. Documents that evidence refer to or reflect the process and/or procedures to change a/the password for the Coffee County EMS server at all times during the Relevant Time Period.

Response: None.

10. All Documents provided by You to the Secretary of State or State Election Board related to the Coffee County's Election System and EMS server, including documents or communications related to any investigation concerning Coffee County's Election System and EMS server.

Response: Coffee County Board of Elections and Registration has no additional documents to provide in response to this request outside of what

has been previously provided to Marilyn Marks in response to prior Open Records Requests to Coffee County, which Plaintiffs have previously agreed need not be re-produced.

11. All Documents that evidence, refer to, or reflect any Communications (oral, electronic or written) by or between You and/or the Secretary of State, the State Elections Board and its members, other Georgia counties, and/or other third parties relating to any Unauthorized Access to Coffee County's Election System, EMS Servers and Election Data, including any Communications concerning the images or electronic files obtained during any Unauthorized Access to Coffee County's Election System, EMS Servers and Election Data.

Response: We object to this request to the extent that this request seeks attorney client privileged communications and/or attorney work product; subject to said objection and without waiving same, Coffee County Board of Elections and Registration responds as follows: Coffee County Board of Elections and Registration has no additional documents of which it is aware to provide in response to this request outside of what has been previously provided to Marilyn Marks in response to prior Open Records Requests to Coffee County, which Plaintiffs have previously agreed need not be re-produced.

12. All Documents that evidence, refer to, or reflect any actual or potential security vulnerabilities, risks, failings, deficiencies, concerns, complaints, hacks, tabulation discrepancies, or compromises involving any aspect of Coffee County's Election System, including but not limited to any computer systems or network environments that support the operation of the Election System.

Response: Coffee County Board of Elections and Registration has no additional documents to provide in response to this request outside of what has been previously provided to Marilyn Marks in response to prior Open Records Requests to Coffee County, which Plaintiffs have previously agreed need not be re-produced.

13. All Documents that evidence, refer to, or reflect any Communications by or between You (internal communications), the Secretary of State, Georgia counties, and/or other third parties, regarding this litigation.

Response: We object to this request to the extent that this request seeks attorney client privileged communications and/or attorney work product; subject to said objection and without waiving same, Coffee County Board of Elections and Registration responds as follows: Coffee County Board of Elections and Registration has no additional documents to provide in response

to this request outside of what has been previously provided to Marilyn Marks in response to prior Open Records Requests to Coffee County.

14. All Documents that evidence, refer to, or reflect any copying of, or access to, any component of Georgia's Election System, or any data located on any such component, that was not duly authorized by one or more State election officials with authority to lawfully allow such access.

Response: None.

15. All Documents, including any Communications, that evidence, support, concern, or refer to the December 10, 2020 Letter from the Coffee County Board of Elections and Registration directed to the House Governmental Affairs Committee, with the subject "Elections Investigative Hearing."

Response: None.

16. All Documents that evidence, refer, to, or reflect authorization to transfer the custody of all electronic election records on the EMS server to the Secretary of State.

Response: None.

HALL BOOTH SMITH, P.C.

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